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15 *Attorneys for Defendant  
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

17 Waymo LLC,  
18 Plaintiff,  
19  
20 v.  
21 Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,  
22 Defendants.

Case No. 3:17-cv-00939-WHA

**OTTO TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS SUPPLEMENTAL  
NOTICE OF JOINDER IN UBER  
TECHNOLOGIES INC. AND  
OTTOMOTTO'S MOTION TO EXCLUDE  
TESTIMONY AND OPINIONS OF  
WAYMO'S DAMAGES EXPERT  
MICHAEL WAGNER (Dkt. No. 1619)**

Hearing Date: September 27, 2017  
Hearing Time: 8:00 a.m.  
Courtroom: 8, 19<sup>th</sup> Floor  
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Declaration of Neel Chatterjee
2. [Proposed] Order
3. Redacted/Unredacted Version
4. Proof of Service

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto  
 2 Trucking”) submits this Administrative Motion to File Under Seal Portions of Its Supplemental  
 3 Notice of Joinder in Uber Technologies Inc. and Ottomotto’s Motion to Exclude Testimony and  
 4 Opinions of Waymo’s Damages Expert Michael Wagner (Dkt. No. 1619) (the “Supplemental  
 5 Joinder”). Specifically, Otto Trucking requests an order granting leave to file under seal the  
 6 confidential portions of the following document:

Document	Portions to Be Filed Under Seal	Designating Parties
Supplemental Joinder	Highlighted portions	Waymo (green)

10 The above-referenced portions of the Supplemental Joinder highlighted in green relate to  
 11 information from Mr. Wagner’s deposition which Waymo has designated “Confidential” or  
 12 “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto  
 13 Trucking states no position about whether the confidentiality designations are appropriate. Otto  
 14 Trucking anticipates that Waymo will file any necessary declarations to seal the above information  
 15 pursuant to Local Rule 79-5.

16 Otto Trucking’s request to seal is narrowly tailored to those portions of the Supplemental  
 17 Joinder that merit sealing.

18  
 19 Dated: September 26, 2017

Respectfully submitted,

20 By: /s/ Neel Chatterjee  
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 27 *Attorneys for Defendant:*  
 Otto Trucking LLC

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that I electronically filed the foregoing document including all of its  
3 attachments with the Clerk of the Court for the United States District Court for the Northern  
4 District of California by using the CM/ECF system on September 26, 2017. I further certify that  
5 all participants in the case are registered CM/ECF users and that service of the publicly filed  
6 documents will be accomplished by the CM/ECF system.

7                   I certify under penalty of perjury that the foregoing is true and correct. Executed this 26th  
8 day of September in Menlo Park, California.

9                   \_\_\_\_\_  
10                   /s/ *Neel Chatterjee*  
11                   Neel Chatterjee  
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